

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CHRISTINA LIEF F/B/O TASHA LIEF,)	
)	
Plaintiff,)	
)	
Vs.)	Civil Action No _____
)	
CAPE HENLOPEN SCHOOL DISTRICT)	
and the DELAWARE DEPARTMENT of)	
EDUCATION,)	
)	
Defendants)	

NOTICE OF REMOVAL

Defendants the Cape Henlopen School District (hereinafter, "the District" and the State of Delaware Department of Education (hereinafter, "the Department"), collectively, hereinafter, the "Defendants", by and through their undersigned counsel, hereby give notice that this matter has been removed, pursuant to 28 U.S.C. § 1446, to the United States District Court for the District of Delaware. The grounds for the removal are as follows:

1. Plaintiff Christina Lief ("Plaintiff") commenced this action, entitled *Christina Lief F/B/O/ Tasha Lief v Cape Henlopen School District and Department of Education- State of Delaware, Case No 06-10541* in the Family Court of the State of Delaware in and for Sussex County. On information and belief, the Complaint (styled as a "Petition- Appeal Hearing Decision and Order") was filed on or about April 4, 2006.

2. In her Complaint, Plaintiff appeals an adverse decision by a due process hearing panel and appears to allege that the Defendants violated the Individuals with Disabilities Education Act ("IDFA"), 20 U.S.C. § 1400 *et seq*, the Rehabilitation Act, 29 U.S.C. § 794 ("Section 504"), 42 U.S.C. § 1983, 14 Del. C. § 3122, and 14 Del. C. § 3142. Plaintiff further alleges that the Hearing Decision and Order by reversed and that she is entitled to

"reimbursement for compensatory education, tuition reimbursement for private placement, an award of all fees, cost[s] and expenses (including reasonable counsel fees) associated with the Hearing Panel and Appeal process, together with such other relief as this Honorable Court deems just and equitable in the case at bar."

3 The Court has original jurisdiction to adjudicate the above-referenced dispute on the basis of 20 U.S.C. § 1415(i)(2)(A) which provides that "any party aggrieved by the findings and decision made under this subsection, shall have the right to bring a civil action with respect to the complaint presented pursuant to this section, which action may be brought in any State court of competent jurisdiction or in a district court of the United States, without regard to the amount in controversy." This case is, therefore, removable to this Court under 28 U.S.C. § 1441(b).

4. To the extent Plaintiff is asserting any claims under the Delaware state special education statutes (Title 14, Chapter 31 of the Delaware Code), this Court has supplemental jurisdiction over said claims pursuant to 28 U.S.C. § 1367.

5. This Notice of Removal is being filed within 30 days of the Defendants' receipt of the Complaint and is hereby timely filed under 28 U.S.C. § 1446(b).

6. Copies of the Summons and Complaint served upon Defendants, are attached hereto.

7. Defendants have filed a true and correct copy of the Notice of Removal with the Family Court of the State of Delaware in and for Sussex County, as required by law. A copy of that Notice is attached hereto.

WHEREFORE, Defendants respectfully request that this action now pending against them in the Family Court of the State of Delaware in and for Sussex County, be removed

therefrom to this Court and that this action be placed upon the docket of this Court for further proceedings, as though this action originally had been instituted in this Court.

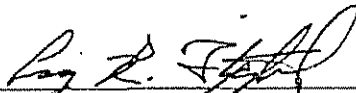
Respectfully submitted,

YOUNG CONAWAY STARGATT & TAYLOR, LLP



Scott A. Holt, Esquire (No. 3399)
Michael P. Stafford, Esquire (No. 4461)
The Brandywine Building
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, Delaware 19879-0391
Telephone: (302) 571-6623; 571-6553
Facsimile: (302) 576-3299; 576-3461
Email: sholt@ycst.com
mstafford@ycst.com

Attorneys for Defendant Cape Henlopen School District



Craig R. Fitzgerald, Esquire (No. 3730)
Deputy Attorney General
Civil Division- Kent County
102 West Water Street
Dover, Delaware 19904
Telephone: (302) 739-7641 ext 303
Facsimile: (302) 739-7652
Email: craig.fitzgerald@state.de.us

Attorney for Defendant Delaware Department of Education


Dated: April 27, 2006

CERTIFICATE OF SERVICE

I, Michael P. Stafford, certify that on April 27, 2006, I caused a copy of the foregoing Defendants' Notice of Removal, along with related documents and this certificate of service, to be served by hand-delivery on the following counsel of record:

Bruce A. Rogers, Esq.
BRUCE A. ROGER & ASSOCIATES
16 South Front Street
Georgetown, Delaware 19947

YOUNG CONAWAY STARGATT & TAYLOR, LLP



Scott A. Holt, Esquire (No. 3399)
Michael P. Stafford, Esquire (No. 4461)
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P O. Box 391
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Facsimile: (302) 576-3299; 576-3461
Email: sholt@ycst.com
mstafford@ycst.com

Dated: April 27, 2006

The Family Court of the State of Delaware

In and For ☐ New Castle ☐ Kent ☒ Sussex County

PETITION – APPEAL HEARING DECISION AND ORDER

PETITIONER

Christina Lief F/B/O Tasha Lief
251 Fennel Dun Circle
Biltmore, NC 28715-8911
Attorney: Bruce A. Rogers, Esquire

RESPONDENTS

Cape Henlopen School District
1270 Kings Highway
Lewes, DE 19958
Attorney: David Williams, Esquire
Department of Education – State of Delaware
401 Federal Street, Suite 2
Dover, DE 19901
Attorney: Louann Vari, Esquire

File Number(s)

Petition Number(s)

Petitioner alleges the following:

1. IDEA Section 504, CFR 300.125 and 14 Del.C. Section 3122 were improperly applied during the hearing, thereby denying the parent due process.
2. The hearing panel failed to apply the relevant and applicable law in the area (case law, statutes and decisions), thereby committing legal error.
3. The hearing panel erred in their treatment of the parent's position on the matter in violation of 14 Del.C. Section 3142.
4. The hearing panel repeatedly inferred facts which were not in evidence through documents or witnesses, thereby creating legal error and denying the parent due process.
5. The transcript is replete with issues of procedural and substantive due process violations. The panel was openly hostile to the parent. The panel was overly solicitous of the District (by way of example and not by way of limitation, the panel recommended a specific motion be filed, granted time for the motion to be filed and announced the likely decision if the motion were to be filed, to the prejudice of parent). The decision of the panel, based upon this hostile and prejudicial panel, violates the procedural and substantive due process rights of parent and student herein.
6. FAPE entitles the student to receive special education and related services designed to meet her specific needs. The District failed to do so (ex: Open Court Remediation) and the panel failed to recognize this error.
7. IDEA requires the child and parent to receive a fair due process hearing with impartial and knowledgeable panel members. Such was not the case here. For example, and not by way of limitation, the Panel chair was openly hostile to parent and her counsel and panel member Werner was not an impartial member.
8. The panel failed to recognize the illegal disclosure of confidential information regarding the student to a Union representative and others not part of the IEP process and the resulting violation of student's rights in the decision. This violation has been found to exist and sanctioned by the Department of Education, however, the panel failed to address this serious violation.
9. The panel violated the civil rights of the student in the manner in which the hearing was conducted and in the clearly erroneous decision entered. IDEA. 20 USC 1400.
10. Parent was denied access to all of the student's records within the control of the District. These records were sanitized by the counsel for the District and several documents were not produced despite the request of the parent to do so. It was as if an entire file of documents was missing from the school and district records.
11. The panel decision and conduct of the hearing gives rise to a violation of student's rights and gives rise to a separate cause of action pursuant to 42 USC Section 1983.

12. District counsel stated on the record that she "knew parent was going to file" for due process and then proceeded to take control and custody of the student's records without following proper procedures. As a result, parent was denied access to the entire student file.
13. The panel improperly shifted the burden of proof and the burden of persuasion to the parent/child.
14. The panel improperly substituted its judgment and opinion for the appropriate educational determinations as to methodologies employed in the education of student.
15. The panel improperly defined FAPE and could not, therefore, properly determine if the student had received FAPE.
16. The panel improperly decided upon the evaluations of the student in the case. The only evaluations of the student were provided by the parent and should have been the ones which governed the development of the IEP and the determination of FAPE. The panel failed to properly consider the weight of these evaluations.
17. The panel improperly defined "fluency" and improperly applied it to the case at bar.
18. The panel relied upon information which was not properly admitted, not otherwise admissible and not subject to cross examination by the parent/counsel.
19. The panel failed to consider the interpretation of the Kennedy-Kreiger reports, relying instead upon non-expert, unqualified testimony from District employees.
20. The panel erroneously ignored the diagnosis of the student as dyslexic, thereby ignoring certain procedural and substantive educational safeguards for the student.
21. The panel failed to consider the fact that the IEPs were often developed by the District before the parent was able, asked or permitted to participate.
22. Panel member Werner was not an impartial member of the panel as required by statute.
23. The panel failed to properly qualify parent's expert witness as such, despite clear credentials, experience and prior testimony to the contrary. The panel improperly ignored this testimony.
24. The panel reliance upon the testimony of Mr. Jefferson was in error as he was not qualified to testify.
25. The panel reliance upon the testimony of Ms. Joyner was in error as she testified based upon hearsay evidence which was admitted during the District's case but excluded during the parent's cross examination.
26. The panel failed to consider the diagnosis of Post Traumatic Stress Disorder (PTSD) and the fact that student was punished for behaviors which were a part of her disability.
27. Panel member Werner actually joked about the diagnosis of student's PTSD during the hearing process.

Petitioner seeks the following relief:

The Petitioner asks this court to reverse the Hearing Decision and Order of the panel dated January 31, 2006, to grant reimbursement for compensatory education, tuition reimbursement for private placement, an award of all fees, cost and expenses (including reasonable counsel fees) associated with the Hearing Panel and Appeal process, together with such other relief as this Honorable Court deems just and equitable in the case at bar.

SWORN TO AND SUBSCRIBED

Before me this date,

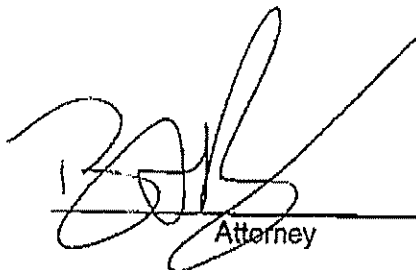
March 29, 2006

DAWN M. CAREY

NOTARY PUBLIC

STATE OF DELAWARE

MY NOTARY PUBLIC COMMISSION EXPIRES 2/1/08



Attorney

16 S. Front Street Georgetown, DE 19947
Address

Form 498

CERTIFIED MAIL

STATE OF DELAWARE FAMILY COURT: SUSSEX COUNTY
22 THE CIRCLE, GEORGETOWN DE 19947
CIVIL SUMMONS
APPEAL OF DUE PROCESS

LIEF, CHRISTINA

FILE: CS06-01689
CASE: 06-10541

PETITIONER(S)

ATTORNEY(S)

VS.

CAPE HENLOPEN HIGH SCHOOL WILLIAMS, DAVID H.
DEPARTMENT OF EDUCATION VARI, LOUANN J.
RESPONDENT(S) ATTORNEY(S)

TO: CAPE HENLOPEN HIGH SCHOOL
1270 KINGS HIGHWAY
LEWES DE 19958

ATTENTION: CAPE HENLOPEN HIGH SCHOOL AND DEPARTMENT OF EDUCATION

You have been named as the respondent in the attached pleading which has been filed in Family Court. Please read the following statements carefully:

1. You are required by Family Court Civil Rules to file an Answer within twenty (20) days of the receipt of this pleading. Failure to file an answer may result in the entry of a default judgment against you.
2. Your Answer must contain responses to each of the allegations and in the same order as they appear on the pleading.
3. You are required to serve the petitioner's attorney or the petitioner, if not represented, with a copy of your Answer.
4. You will receive a written notice advising you of the date and time you are to appear in Family Court once you have filed your Answer.
5. You must report any change of address to the Court. Failure to report a change of address, or to appear when scheduled, may result in a default judgment or the issuance of a writ of habeas corpus for your arrest.
6. If the attached pleading involves CUSTODY or VISITATION, you will also find the Preliminary Injunction Order in Custody or Visitation which is issued against both parties to the action.

WITNESS THE JUDGES of the Family Court of the State of Delaware, this date

04/07/2006
Date Issued

CINDY LECATES
Clerk of Court

CFCCSOL 04/07/2006

RECEIVED APR 11 2006

IN THE FAMILY COURT OF THE STATE OF DELAWARE
IN AND FOR SUSSEX COUNTY

Christina Lief F/B/O Tasha Lief, : FILE NO.:
Petitioner, : PETITION NO.:
v. :
Cape Henlopen School District :
Department of Education – State of DE :
Respondents. :

AFFIDAVIT OF MAILING

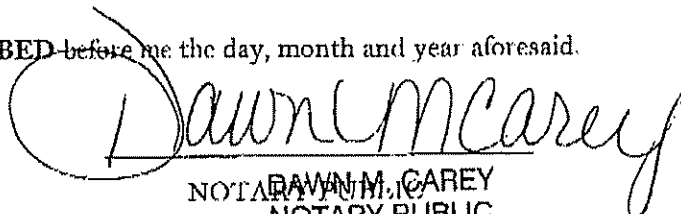
BE IT REMEMBERED, that on this 30th day of March, 2006, personally appeared before me, the Subscriber, a Notary Public for the State and County aforesaid, Fred Dobronz, a secretary for the law firm of BRUCE A. ROGERS, P.A., ATTORNEY AT LAW, Georgetown, Delaware, and being by me duly sworn according to law, deposes and say that on the 30th day of March, 2006, he forwarded two copies of an ENTRY OF APPEARANCE, in the above captioned case, via United States mail, postage prepaid to:

David Williams, Esquire
Morris James Hithens & Williams LLP
222 Delaware Avenue, 10th Floor
PO Box 2306
Wilmington, DE 19899-2306

Louann Vari, Esquire
Department of Justice
102 West Water Street
Dover, DE 19904-6750


FRED DOBRONZ

SWORN TO AND SUBSCRIBED before me the day, month and year aforesaid.


DAWN M. CAREY
NOTARY PUBLIC
STATE OF DELAWARE
MY COMMISSION EXPIRES 2/11/08

IN THE FAMILY COURT OF THE STATE OF DELAWARE
IN AND FOR SUSSEX COUNTY

CHRISTINA LIEF F/B/O TASHA LIEF,)

Petitioner,)

Vs.)

Civil Action No. 06-10541

CAPE HENLOPEN SCHOOL DISTRICT)

and the DELAWARE DEPARTMENT of)

EDUCATION,)

Respondents.)

NOTICE OF FILING NOTICE OF REMOVAL

TO: Karen Gerardi, Civil Clerk of the Court
22 The Circle
Georgetown, DE 19947

PLEASE TAKE NOTICE that Respondents Cape Henlopen School District and Department of Education- State of Delaware, have removed the above-styled action from the Family Court of the State of Delaware in and for Sussex County, in which it was initially filed, to the United States District Court for the District of Delaware.

Attached hereto, and made a part hereof, is a copy of the Notice of Removal that has been filed in the United States District Court for the District of Delaware.

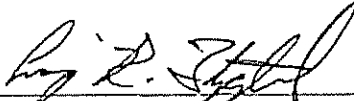
Respectfully submitted,

YOUNG CONAWAY STARGATT & TAYLOR, LLP



Scott A. Holt, Esquire (No. 3399)
Michael P. Stafford, Esquire (No. 4461)
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Facsimile: (302) 576-3299; 576-3461
Email: sholt@ycst.com
mstafford@ycst.com

Attorneys for Respondent Cape Henlopen School District



Craig R. Fitzgerald, Esquire (No. 3730)
Deputy Attorney General
Civil Division- Kent County
102 West Water Street
Dover, Delaware 19904
Telephone: (302) 739-7641 ext 303
Facsimile: (302) 739-7652
Email: craig.fitzgerald@state.de.us

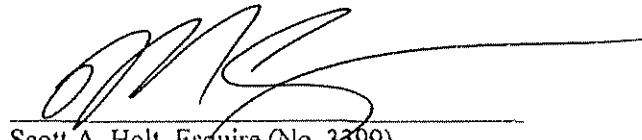
Attorney for Respondent Delaware Department of
Education

Dated: April 27, 2006

CERTIFICATE OF SERVICE

I, Michael P. Stafford, Esquire, hereby certify that the foregoing Respondents' Notice of Filing Notice of Removal, along with related attachments, and this certificate of service, was served on April 27, 2006, by hand delivery on the following Petitioner's counsel of record:

Bruce A. Rogers, Esq
BRUCE A. ROGER & ASSOCIATES
16 South Front Street
Georgetown, Delaware 19947



Scott A. Holt, Esquire (No. 3399)
Michael P. Stafford, Esquire (No. 4461)
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Facsimile: (302) 576-3299; 576-3461
Email: sholt@yest.com
mstafford@yest.com

Dated: April 27, 2006

JS 44 (Rev 11/04)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

Christina Lief F/B/O Tasha Lief

(b) County of Residence of First Listed Plaintiff Buncombe, NC
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Bruce A. Rogers, Esquire
BRUCE A. ROGERS & ASSOCIATES
The Bramble Building
116 South Front Street
Georgetown, Delaware 19847

DEFENDANTS

Cape Henlopen School District and the Delaware Department of Education

County of Residence of First Listed Defendant Sussex
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED

Attorneys (If Known)

Michael B. Stafford, Esquire
Young Conway Stappett & Taylor, LLP
P. O. Box 301
Wilmington, DE 19809

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
☒ 3 Federal Question (U.S. Government Not a Party)
☐ 2 U.S. Government Defendant
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | | |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State | <input checked="" type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609
				<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN

(Place an "X" in One Box Only)

- ☐ 1 Original Proceeding
☒ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Recopened
☐ 5 Transferred from another district (specify)
☐ 6 Multidistrict Litigation
☐ 7 Appeal to District Judge from Magistrate Judgement

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

28 U.S.C. 1441

Brief description of cause:

Removal based on federal question

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

4/27/06



FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG JUDGE _____